

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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STEVEN GOLDSTEIN individually and on behalf of  
CONGREGATION BNEI MATISYAHU, and MEIR  
ORNSTEIN,

*Plaintiffs,*

-against-

**SUPPLEMENTAL  
DECLARATION OF AMEER  
BENNO IN FURTHER SUPPORT  
OF PLAINTIFFS' MOTION FOR A  
PRELIMINARY INJUNCTION**

Index No.: 22-cv-8300 (VSB)

KATHY HOCHUL, in her official capacity as Governor of  
the State of New York; LETITIA JAMES, in her official  
capacity as Attorney General of the State of New York;  
KEECHANT SEWELL, in her official capacity as  
Commissioner of the New York City Police Department;  
LOUIS FALCO, III, in his official capacity as Rockland  
County Sheriff; ERIC GONZALEZ, in his official capacity  
as the District Attorney of Kings County; and THOMAS  
WALSH, II, in his official capacity as the District Attorney  
of Rockland County,

*Defendants.*

-----X  
AMEER BENNO, declares under penalty of perjury that the following is true and correct:

1. I am an attorney with BENNO & ASSOCIATES P.C., co-counsel for plaintiffs  
herein.

2. I make this supplemental declaration in further support of plaintiffs' motion for a  
preliminary injunction, and I respectfully submit this supplemental declaration in order to place  
the relevant information and documents on the record.

3. Plaintiffs respectfully submit the following exhibits, all of which are true, correct  
and complete copies:

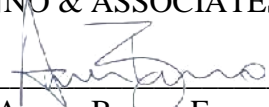
1. New York State Senate Introducer's Memorandum in Support. Bill S51001;
2. Decision and Order in *Hardaway, et al. v. Nigrelli, et al.*, 22-CV-771 (JLS)  
(W.D.N.Y. Oct. 20, 2022)

3. Declaration of Joyce Lee Malcolm;
4. Georgia laws from 1770;
5. Maryland law from 1642;
6. Massachusetts law from 1636-37;
7. South Carolina law from 1743;
8. Virginia law from 1619;
9. New Haven Colony law from 1646;
10. Plymouth Colony law from 1658

4. A copy of my signature, sent electronically or by facsimile transmission, may be treated as the original for the purpose of serving and filing this declaration, and the original will be provided if required.

Dated: New York, New York  
October 24, 2022

BENNO & ASSOCIATES P.C.

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